

REMARKS

Claims 1, 3-8, and 10-12 stand rejected under 35 USC §102(b) as anticipated by Humble. Applicant has amended claim 1 and 13 to further distinguish over the cited patent.

Humble uses a camera to capture an image of a product in a security zone 38. The image is used to verify the identify of the product.

Applicant's claim 1 recites "a security device ... for facilitating identification of a shopper ...".

Applicant's claim 13 recites "generating control messages for security devices for facilitating identification of a shopper ...".

Humble fails to disclose either of these elements.

Claim 2 stands rejected under 35 USC §103(a) as being unpatentable over Humble.

The camera of humble is not for identifying a shopper. Furthermore, one skilled in the art would not be motivated to add zoom, pan, tilt, and focus operations to camera 52 of Humble, since conveyor 36 places products at the proper

location and fixed focal distance for capturing images of the products.

Claims 9 and 13-24 stand rejected under 35 USC §103(a) as being unpatentable over Humble in view of Russek.

As to claim 9, neither references teaches or suggests a system including a pager for facilitating identification of a shopper in response to control messages from a security controller as taught in claim 9.

With respect to claims 13-24, the references fail to teach, "generating control messages for security devices for facilitating identification of a shopper corresponding to the priority level assigned to the event identified in the alert message".

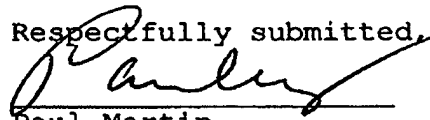
With respect to claim 14, the references fail to teach generating control messages corresponding to zoom, pan, tilt, and focus operations for a camera for facilitating identification of a shopper.

With respect to claim 21, the references fail to teach generating control messages containing a station identifier for transmission to a pager for facilitating identification

of a shopper by alerting a security officer to observe a checkout station.

Applicant now respectfully requests that the pending claims be allowed.

Respectfully submitted,



Paul Martin
Attorney for Applicant
(937) 445-2990

Dayton, OH

OCT 18 2004